

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<p>In re:  PGX HOLDINGS, INC. <i>et al.</i>,  Debtors.</p> <p>KIRSTEN HANSEN on behalf of herself and all others similarly situated,  Plaintiff,  v.  PGX HOLDINGS, INC.; PROGREXION HOLDINGS, INC.; PROGREXION TELESERVICES, INC.; PROGREXION ASG, INC.; PROGREXION IP, INC.; EFOLKS, LLC; CREDITREPAIR.COM, INC.; CREDIT.COM, INC.; and JOHN C. HEATH, ATTORNEY AT LAW PC,  Defendants.</p>	<p>Chapter 11  Case No. 23-10718 (CTG)  (Jointly Administered)</p> <p>Adv. Proc. No. 23-50396 (CTG)</p>
---	---

**AGREED SCHEDULING ORDER**

The parties to the above-captioned adversary proceeding having consented to the schedule contained herein pursuant to Federal Rules of Civil Procedure Rule 26(f), made applicable to adversary proceedings by Federal Rules of Bankruptcy Procedure 7026,

**IT IS HEREBY ORDERED** that:

1. Initial Disclosures: On or before November 8, 2023, the Parties shall exchange their initial disclosures under Rule 26(a)(1).
2. Joinder of Other Parties and Amendment of Pleadings: Any motion to join other parties and/or to amend or supplement the pleadings shall be filed on or before November 15,

2023. However, should a party have good cause to amend based on discovery produced on that date or after, the party may file a motion seeking leave to amend no later than November 21, 2023, and the counter-party may respond to the motion within 3 business days from the filing of the motion

3. Written Discovery: All written discovery shall be completed on or before November 20, 2023, and each party shall respond to each written discovery request within 7 days of service of the same.

4. Expert Disclosures: On or before November 21, 2023, the parties shall exchange Rule 26(a)(2) disclosures are to experts on matters on which they bear the burden of proof, and shall exchange by November 27, 2023, disclosures regarding any rebuttal expert.

5. Depositions: Witnesses shall be made available for deposition on five (5) business days' notice and the parties shall complete all depositions of fact or expert witnesses on or before December 1, 2023.

6. Pre-Trial Disclosures: The Parties shall exchange pretrial disclosures under Rule 26(a)(3) and file a list of witnesses and exhibits on or before December 6, 2023, at 11:59 p.m. (EST).

7. Protective Order: The Parties shall enter into a stipulated confidentiality and protective order which shall govern discovery in this case.

8. Tentative Pre-Trial Court Conference: A conference with the Court is tentatively set for December 7, 2023, at 11:30 a.m., to resolve any outstanding issues that the parties may have, and they shall notify the Court at least 24 hours prior if such a conference is requested.

9. Trial. A trial on the WARN claims will be held on December 11, 2023 at 9:30 a.m.

Dated: November 8th, 2023  
Wilmington, Delaware

  
CRAIG T. GOLDBLATT  
UNITED STATES BANKRUPTCY JUDGE